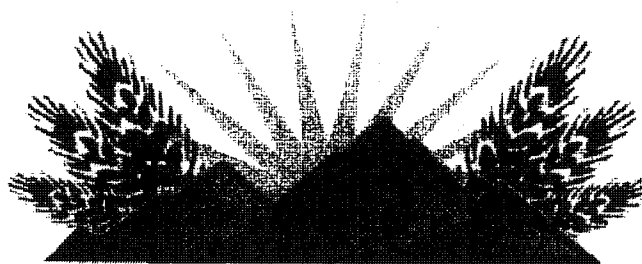


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S & L COMMODITIES

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May 18, 2005

National Organic Standards Board
c/o Arthur Neal
Room 4008 – South Building
1400 and Independence Avenue SW
Washington, DC 20250-0001

Dear Mr. Neal:

We are writing in response to the NOSB "Guidance for Interpretation of section 205.239(a) (2) of the National Organic Program, published for public comment on March 22.

We are against certain portions of the language of Sections (A) and (C), and we are in favor of the language in Section (B).

We're concerned about the negative financial implications that the restrictions of Sections (A) and (C) would have on us as well as many other organic farms in our area. Our ability to produce and sell high quality organic dairy feed has enabled us to continue to exist. The loss of these markets would jeopardize our existence.

We are against two parts of the wording in Section A. First the specific requirement of 30% dry matter intake on a daily basis during the growing season but not less than 120 days. We supply hay and barley to five organic dairies located from Idaho to Texas. The feed we supply is grown on 70 organic farms located in Oregon, Idaho and Utah. These farmers use organic production methods that vary greatly even within this area. We would not like organic farmers from other areas of the country to dictate an arbitrary farm management agenda for our area, and we would not feel justified in doing the same to anyone else. We feel that all farmers should have the freedom to adopt a farm management plan that both upholds organic standards and applies to that specific area.

The wording in Section (A) may work well in certain areas of the country, but would be impossible to implement in others. We do not wish the organic dairy industry that we supply, to be put in peril of losing their ability to exist because of the wording in Section (A), nor would we wish any other part of the country to be put in a similar situation because of a regulation that only worked well in our part of the country.

Secondly, we disagree with the five reporting requirements of Section (A). There are already enough means of verification for a farm management plan in the current organic farm plan. We do not feel these requirements would be beneficial to farmers or the organic program. These requirements appear to be both unworkable and immeasurable. We already have a farm plan filled with time consuming reporting and recordkeeping.

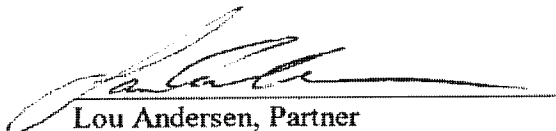
In Section (C) we disagree with using NRCS to regulate dairy animal grazing. Our experience in the livestock industry indicates that NRCS is better suited to manage beef cow pasture grazing than dairy cow pasture grazing.

We feel that Section (B) is ok. We believe all animals should be outside as much as possible and should have access to pasture as it is possible in each region of the country.

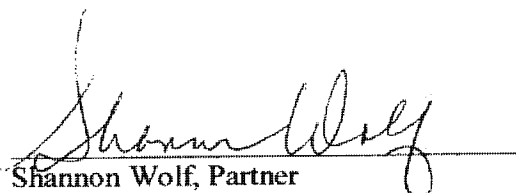
We would appreciate your consideration of our thoughts.

Sincerely,

S&L Commodities



Lou Andersen, Partner



Shannon Wolf, Partner